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## COMMONWEALTH of VIRGINIA

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DIRECTOR

## DEPARTMENT OF WASTE MANAGEMENT

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March 3, 1993

Robert Thomson, PE  
Va./W. Va. Superfund Federal Facilities (3HW71)  
EPA Region III  
841 Chestnut Building  
Philadelphia, PA 19107

RE: Naval Weapons Station, Yorktown, VA  
Draft Identified Site-Screening Areas

Dear Mr. Thomson:

I am in receipt of your letter dated February 16, 1993, which provided a draft summary categorization of the units identified in the *RCRA Solid Waste Management Unit Investigation* as was discussed during our meeting at Yorktown with installation and LANTDIV representatives on February 10 and 11. Based upon my review of the draft document and the notes which I took during the discussion, I would like to offer the following comments for your consideration. We can discuss these issues further during the Federal Facility Agreement negotiations in Williamsburg on March 8, 9, and 10.

General

1. Certain of the subheadings presented in your draft summary do not seem appropriate for the document. Subheadings such as "Units LANTDIV refuses to acknowledge in FFA due to petroleum exclusion/RCRA permit closure/UST removal" and "Units LANTDIV refuses to acknowledge in FFA due to RCRA Subpart X Interim Status" do not accurately reflect the meeting which took place on February 10 and 11. During the discussion, I was under the impression the EPA, the State, LANTDIV and the Installation concurred on the status of each unit and whether it should be included in

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the FFA. I think the headings should read "Units which should not be incorporated due to petroleum exclusion/ RCRA permit closure/UST removal" and "Units which should not be included due to active RCRA Subpart X Interim Status."

Units Identified for Further Action

2. According to my notes, the installation was going to perform on-site PCB screening at AOC O (Site Screening Area #10) to determine the presence of PCBs prior to making the determination to include the unit in the FFA for further action.
3. For Site Screening Area # 14, my notes do not reflect the SWMU 133 (EPIC 41) and SWMU 144 (EPIC 42) should be handled together as one site.
4. Site Screening Area #17 is listed as EPIC Site 34. It should also be identified as SWMU 29. Also, my notes indicate that dredge sampling results would be submitted by the installation and LANTDIV prior to making the determination to include this unit in the FFA. This site should be in the "Information/Sample Results Requested" subheading.
5. According to my notes, Site Screening Area #18, SWMU 72, it awaiting inclusion following the receipt of information regarding usage of explosives and discharge of explosives from Bldgs. 459 and 537, and indication of whether analysis of explosives is incorporated into the NPDES permit for this discharge source. This site should be in the "Information/Sample Results Requested" subheading.
6. According to my notes, Site Screening Area #19, AOC J Blasting Grit Spill Area, the installation will perform a one-time sampling and analysis for metals in the area of the spill to determine if the unit should be incorporated into the FFA or not. This site should be in the "Information/Sample Results Requested" subheading.
7. According to my notes, for Site Screening Area #20, AOC M, the potential for a removal action in conjunction with the proposed removal action for SWMU 104 (Site Screening Area #30) was discussed. If this is the case, this Site Screening Area would more appropriately appear under the subheading "Removal Action Recommended."
8. According to my notes, at Site Screening Area #21, a one-time sampling and analysis for metals is to be performed prior to making the determination of inclusion of the site into the FFA. This site should be in the "Information/Sample Results Requested" subheading.

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Units Identified for Further Action - Removal Actions Recommended

9. According to my notes, for Site Screening Area #29, SWMU 161 Refrigerator/Debris Disposal Area, a removal action already took place in 1992, and documentation of this removal was requested during our discussions.

Units Identified for Further Action - Information/Sample Results Requested before Recommending Further Action

8. Please note that it was discussed during our meeting that Site Screening Areas 31 and 32, SWMUs 38 and 97, are not actually SWMUs, but areas of concern (AOCs) since the units managed product not waste.

Units Identified for Further Action - Units LANTDIV refuses to acknowledge in FFA due to petroleum exclusion/RCRA permit closure/ UST removal

9. For Site Screening Area 46, SWMU 71, the installation was asked to provide documentation of the usage of the unit.
10. For Site Screening Areas 47 and 48, SWMUs 74 and 87 respectively, both units are active RCRA units which have had closure plans submitted to the Department of Waste Management. We had numerous discussions regarding the applicability of the CERCLA program to these RCRA units, and whether a Corrective Action deferral permit will be used to move these units into the CERCLA program. It is anticipated that the status of these units and their closures will be discussed during the FFA Negotiations next week in Williamsburg.
11. For Site Screening Area 49, AOC I, a formal UST closure has already been scheduled under the Virginia State Water Control Board's jurisdiction, in 1996. The issue discussed during the meeting was whether an UST removal would meet CERCLA requirements, and whether or not state-mandated timeframes would be followed at NPL sites. Again, this is another topic for discussion at the FFA Negotiations. This same issue applies for Site Screening Areas 51, 52, 53, 54, 55, and 56.

Units Identified for Further Action - Units LANTDIV refuses to acknowledge in FFA due to RCRA Subpart X Interim Status

12. According to my notes, for Site Screening Activities 58 - 63, all parties attending the discussions at Yorktown concurred that the units would be addressed via a corrective

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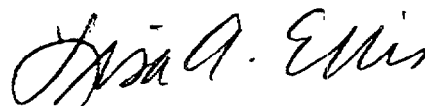
action deferral permit, which would then cause the units to be addressed under CERCLA.

Units Identified for Further Action - Units LANTDIV claims are not SWMUs

13. Site Screening Area 64 is a Solid Waste Management Unit, however due to the nature of the unit (i.e., satellite accumulation), and regular inspections of the unit, there was no potential for release of hazardous constituents from this unit, and therefore the unit did not belong in the FFA. This issue of temporary storage and no potential for release also applies to Site Screening Area 66, the PW Battery Storage Area.
14. Site Screening Area 67, the Supply Storage Yard is not a SWMU since only product was stored in the area. Also, there was no evidence of release at the unit. According to my notes, there was general concurrence during our discussion that this unit did not belong in the FFA Attachment. Also, as no wastes were stored at Site Screening Area 69, Container Storage Area, and there was no evidence of release, it was also concurred that this unit required no further action. There was also no potential for release from Site Screening Area 68, which is why we concurred to omit this unit.
15. The description of Site Screening Area 70, SWMU 179, in the summary is accurate. However, LANTDIV did not contend that the unit was a SWMU, rather, that it was infeasible to investigate the sumps, trenching and piping as one installation-wide unit. LANTDIV requested a clarification of specific units if the sumps, trenching and piping was to be included in the FFA attachment.

If you have any questions, please feel free to contact me at (804) 225-2906. I look forward to discussing these issues with you in Williamsburg during the FFA Negotiations.

Sincerely,



Lisa A. Ellis  
Remedial Project Engineer  
Federal Facilities Program

cc: K.C. Das  
Erica Dameron  
Brenda Norton, LANTDIV